

U.S. Department of Energy Office of Legacy Management



Procedure: 200.2-1

Effective: 3/6/06

SUBJECT: ELECTRONIC RECORDKEEPING SYSTEMS (ERKS) AND ELECTRONIC INFORMATION SYSTEMS (EIS)

1. PURPOSE. To provide U.S. Department of Energy (DOE) Office of Legacy Management (LM) personnel with instructions for identifying, maintaining, preserving, and dispositioning each LM ERKS and EIS according to DOE requirements.
2. CANCELLATION. None
3. REFERENCES.
 - a. 44 *United States Code (U.S.C.)* 29–35, Records Management
 - b. 44 *U.S.C.* 36, Federal Management and Promotion of Electronic Government Services
 - c. 36 *Code of Federal Regulations* Chapter XII, Subchapter B (Part 1234), Electronic Records Management
 - d. DOE Standard DOE-STD-4001-2000, Design Criteria Standard for Electronic Records Management Software Applications, March 2000
 - e. LM Procedure 200.1-1, File Plan
 - f. LM Procedure 200.2, Electronic Records
 - g. National Archives and Records Administration (NARA) Bulletin 2006-02, NARA Guidance for Implementing Section 207(e) of the E-Government Act of 2002
 - h. NARA E-Gov Electronic Records Management Initiative – Recommended Practice: Evaluating Commercial Off-the-Shelf (COTS) Electronic Records Management (ERM) Applications, November 2005

4. DEFINITIONS.

- a. Electronic Information System (EIS) -- A system that contains and provides access to computerized information, which may include Federal records. An EIS may include a spreadsheet, a tracking system, or other function designed to automate business functions. An EIS may or may not incorporate all aspects of appropriate electronic recordkeeping, depending on its design characteristics.
- b. Electronic Record -- Any information that is recorded in a form that only a computer can process and that satisfies the definition of a record. (See Records definition below.)
- c. Electronic Recordkeeping System (ERKS) -- An EIS that meets an agency's recordkeeping needs. NARA defines an ERKS as an EIS in which records are collected, organized, and categorized to facilitate their preservation, retrieval, use, and disposition. An ERKS ensures that the records it maintains will have sufficient authenticity and reliability to meet the agency's recordkeeping requirements. These requirements are based in statute, ensuring "adequate and proper documentation," which contributes to efficient and economical agency operations.
- d. Enterprise Management Representative -- LM representative who works with the Records Liaison Officer (RLO) to review each EIS to determine whether it should be categorized as an ERKS. The Enterprise Management Representative also ensures that each ERKS is properly maintained, dispositioned, and -- when no longer needed -- properly retired.
- e. Hummingbird Records Management Database -- LM tool for organizing information about each ERKS and EIS maintained by LM.
- f. Information Management Data Entry Representative -- LM representative who ensures information about each EIS and ERKS is properly maintained in the Hummingbird Records Management Database.
- g. Manager of Data Processing Operations -- LM representative responsible for compiling and maintaining information about each ERKS and EIS maintained by LM.
- h. Nonrecord Materials -- Informational materials excluded from the legal definition of records or not meeting the requirements of that definition. Includes extra copies of documents kept only for convenience of reference, stocks of publications and processed documents, and library or museum materials intended solely for reference or exhibition.

- i. RLO -- LM representative who ensures that records management issues relating to each ERKS are properly addressed. The RLO works with other personnel identified in this procedure to conduct initial registration and annual inventory of each EIS.
 - j. Records -- All books, papers, maps, photographs, machine-readable materials, or other documentary materials, regardless of physical form or characteristics, made or received by an agency of the U.S. Government under Federal law or in conjunction with the transaction of public business and preserved or appropriate for preservation by that agency or its legitimate successor as evidence of the organization, functions, policies, decisions, procedures, operations, or other activities of the Government or because of the informational value of data in them.
 - k. System Owner -- Designated Enterprise Management contact who works with the Enterprise Management Representative and the RLO to ensure that records in an ERKS are maintained in compliance with applicable laws, regulations, and DOE requirements.
5. QUALITY CONTROL.
- a. Systems used to store electronic records must meet the requirements set forth in DOE Standard DOE-STD-4001-2000, Design Criteria Standard for Electronic Records Management Software Applications, March 2000.
 - b. The RLO ensures that each ERKS and EIS is inventoried annually.
 - c. The RLO reviews this procedure annually and as necessary to accommodate changing conditions within LM and to ensure compliance with applicable laws, regulations, and DOE requirements.
6. RESPONSIBILITIES.
- a. LM Office Directors support records management electronic recordkeeping requirements and are responsible for the implementation of this procedure and for adherence to the requirements in this procedure by each organizational unit.
 - b. The Supervisor of Archives and Information Management (AIM), serving as the Program Records Officer (PRO), ensures that each new and existing ERKS and EIS adheres to the electronic recordkeeping requirements in this procedure.

- c. The RLO:
 - Evaluates each new or existing EIS and works with the System Owner and Enterprise Management Representative to determine whether the system meets the requirements of an ERKS and whether it should be registered and maintained as an ERKS.
 - Ensures that provisions are made to protect records in systems that do not meet the requirements of an ERKS.
 - Ensures that ERKS and EIS inventories are conducted annually.
 - d. The Enterprise Management Representative:
 - Reviews, in conjunction with the RLO, each new or existing EIS to determine whether it meets the requirements of an ERKS.
 - Reviews and implements decisions to retire an ERKS that are no longer needed.
 - e. The System Owner completes an Electronic System Registration/Inventory form (LM Form 200.1-5) for each system and works with the RLO and Enterprise Management Representative to clarify any information needed to designate the system as either an EIS or an ERKS.
 - f. The Manager of Data Processing Operations is responsible for developing baseline information about each ERKS and EIS maintained by LM.
 - g. The Information Management Data Entry Representative ensures that information concerning each electronic system is entered in the Hummingbird Records Management Database.
7. TRAINING REQUIREMENTS. Personnel with responsibilities for an EIS or ERKS should be cognizant of the applicable requirements and processes within this procedure.
8. DOCUMENT CONTROL.
- a. Each registered electronic system is maintained and tracked in the Hummingbird Records Management Database and overseen by the Enterprise Management Representative.
 - b. The current and official controlled hard-copy version of this document shall reside with the Directives Manager.
 - c. The Directives Manager shall place the most current version of this procedure on the LM Intranet in a read-only format.

9. PROCEDURE.

Attachment A. illustrates the process of registering, maintaining, and retiring an ERKS.

a. System Registration

- (1) The RLO or the System Owner identifies an EIS that should be considered for inclusion in the Hummingbird Records Management Database. A system is:
 - Identified during an initial or annual inventory of electronic systems,
 - Identified as it is being developed by LM personnel, or
 - Transferred to LM control from a closure site.
- (2) The System Owner:
 - (a) Completes the System Information portion of LM Form 200.1-5, Electronic System Registration/Inventory. This portion of the form includes questions concerning the system's recordkeeping capabilities, the categories of information stored, and various elements that are evaluated in determining whether a system is an ERKS.
 - (b) Submits the Electronic System Registration/Inventory form to the Enterprise Management Representative and the RLO.
- (3) The Enterprise Management Representative and the RLO:
 - (a) Determine whether the EIS meets the requirements for an ERKS according to DOE Standard DOE-STD-4001-2000, Design Criteria Standard for Electronic Records Management Software Applications (See Attachment B. – Electronic System Requirements). The determination can be that:
 - The system meets ERKS requirements and can be designated as an ERKS.
 - The system does not meet all the requirements for an ERKS. The RLO works with the System Owner and Enterprise Management Representative to ensure the system is modified to meet the requirements or to transfer any record information to an appropriate ERKS.

- The system is not an ERKS.
- (b) Determine retention and disposition of records in the ERKS.
- (c) Complete the Registration portion of the Electronic System Registration/Inventory form.
- (d) Forward the Electronic System Registration/Inventory form to the Information Management Data Entry Representative.
- (4) The Information Management Data Entry Representative enters information from the Electronic System Registration/Inventory form into the Hummingbird Records Management Database.

b. System Inventory

The Enterprise Management Representative conducts annual inventories of each ERKS and EIS to determine its status. As part of the inventory:

- (1) The System Owner:
 - (a) Initiates LM Form 200.1-5, Electronic System Registration/Inventory, for each registered ERKS and EIS as part of the inventory process.
 - (b) Forwards the Electronic System Registration/Inventory form to the Enterprise Management Representative and the RLO.
- (2) The Enterprise Management Representative and RLO:
 - (a) Review the Electronic System Registration/Inventory form and complete the Registration portion.
 - (b) Forward the Electronic System Registration/Inventory form to the Information Management Data Entry Representative.
- (3) The Information Management Data Entry Representative enters information from the Electronic System Registration/Inventory form into the Hummingbird Records Management Database and files the form according to the LM File Plan.

c. System Retirement

(1) The Enterprise Management Representative:

- (a) Initiates LM Form 200.1-4, Electronic Recordkeeping System Retirement, for any system no longer needed based on the determination made by the System Owner during the annual inventory.
- (b) Ensures system retirement actions are completed, and notes completion on the retirement form.
- (c) Forwards the retirement form to the RLO.

(2) The RLO:

- (a) Ensures records management issues pertaining to the system retirement are addressed and that records have been dispositioned in accordance with the approved retention schedules.
- (b) Completes the RLO portion of the Electronic Recordkeeping System Retirement form and forwards the form to the Information Management Data Entry Representative.

(3) The Information Management Data Entry Representative enters information concerning the system retirement in the Hummingbird Records Management Database and files the Electronic Recordkeeping System Retirement form according to the LM File Plan.

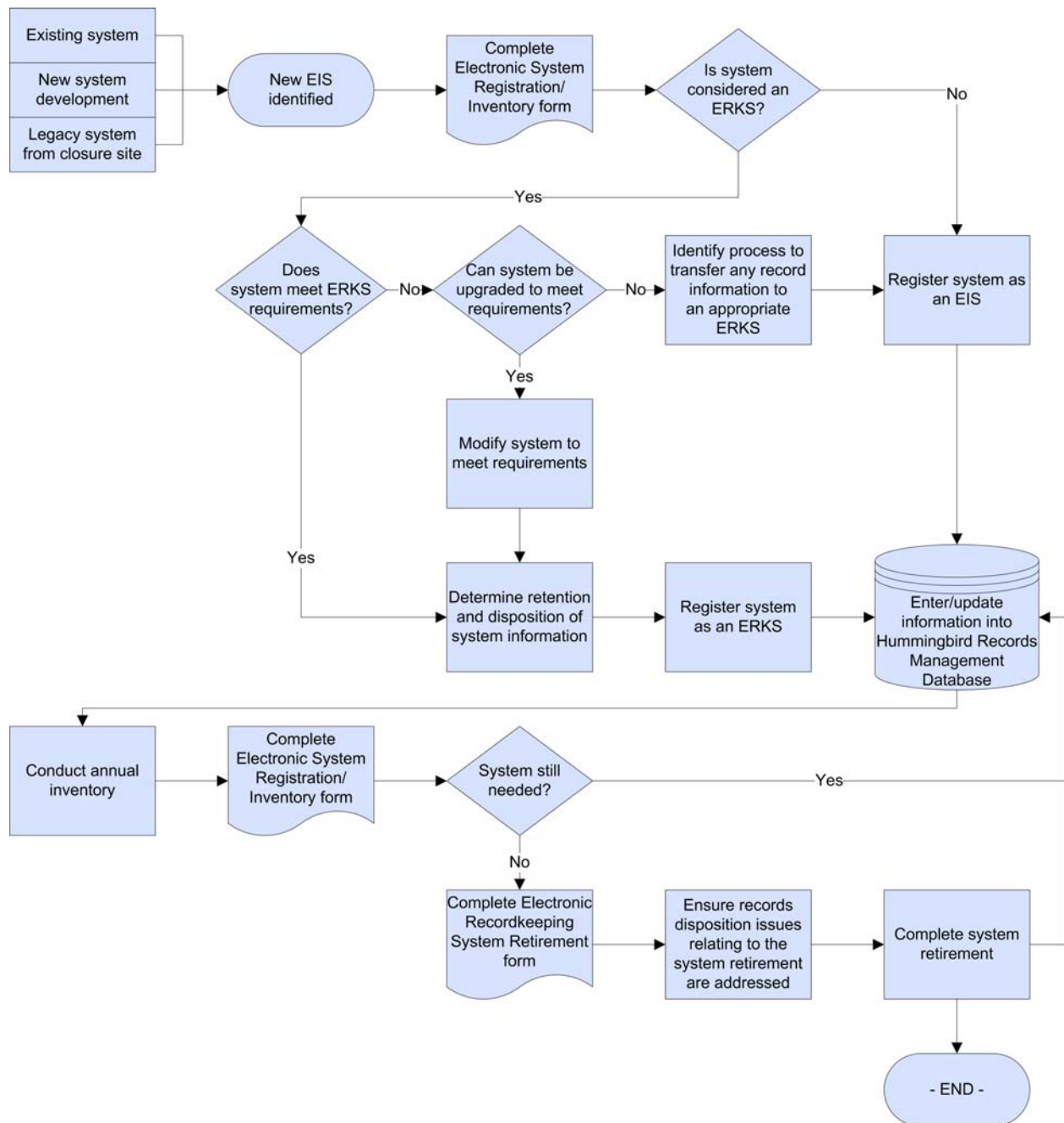
10. ATTACHMENTS.

- a. Attachment A. – Electronic System Registration Flowchart
- b. Attachment B. – Electronic System Requirements

Approved: Original signed by Celinda H. Crawford
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Distribution: As required

Attachment A. – Electronic System Registration Flowchart



Attachment B. – Electronic System Requirements

a. Electronic Information System (EIS) Requirements

- (1) System Owners shall register each EIS with Archives and Information Management (AIM) to determine whether the system meets the criteria of an electronic recordkeeping system (ERKS).
- (2) Each EIS created must meet the following records management-related requirements:
 - (a) System Inventory – Each EIS is required to be registered with AIM. AIM maintains an electronic system inventory and ensures proper maintenance and archiving of electronic records. The status of registered systems is updated annually.
 - (b) Technical Documentation – System Owners must maintain adequate and current technical documentation on each EIS. This documentation shall include:
 - A narrative description of the system, including purpose and scope;
 - Physical and technical characteristics including, but not limited to, a data dictionary or the equivalent information associated with a database management system with a description of the relationships between data elements in databases;
 - File codes and keywords; and
 - Other technical information needed to read or process data in the system.

Technical documentation must accompany the system and data as separately scheduled records upon turnover to the National Archives and Records Administration (NARA).

b. ERKS Requirements

Each ERKS must meet the requirements listed above for an EIS. In addition, System Owners shall provide the Records Liaison Officer (RLO) with documentation that the following recordkeeping elements are properly addressed for any system being considered as an ERKS:

- Record Retrieval—A method is provided for authorized users to retrieve desired records.

- Segregation of Information—The system facilitates distinction between and separation of records and non-record information.
- Security and Data Integrity—Appropriate security is provided to ensure that only authorized users have access to the records and to guarantee the integrity of the records.
- Authentication—A method of authenticating record information is provided.
- Interchange Format—A standard interchange format is provided when necessary to permit the exchange of records on electronic media between computers using different software/operating systems and the conversion or migration of records on electronic media from one system to another.
- Configuration to Support Disposition—Disposition actions and requirements are provided as necessary for transferring permanent records to NARA.
- Media Selection—Identification is included on each storage medium on which records are stored. That identification remains throughout the lifecycle and the maximum time span of the records.
- Data Protection—The system demonstrates adequate protection of records in the case of power interruptions and minimizes the risk of unauthorized additions, deletions, or alterations.

LM Form 200.1-5, Electronic System Registration/Inventory includes the elements in this section. The RLO evaluates information included on this form to determine whether a system should be categorized as an EIS or an ERKS.

c. Additional Requirements

- (1) Each ERKS must have processes incorporated into its design to ensure record information is properly maintained. If not, manual processes must be in place to retain essential information produced by the system. This requirement ensures that EIS records have the essential characteristics of authenticity, integrity, and usability required for the records to be considered trustworthy.
- (2) Technical documentation of the EIS design and operating procedures is required when an electronic record is submitted to NARA. This documentation is scheduled separately.
- (3) In some cases, records originating from an electronic system exist only in electronic form because there is no requirement to produce a hard copy. If there is a high risk of data becoming unreadable because of the imminent end of the service life of the device or technology associated with it, the native data should be converted to a form that will maintain the record's usability.